



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Elizabeth Birch, Treasurer
Human Rights Campaign Fund Political
Action Committee
919 18th Street, NW, Suite 800
Washington, DC 20005

AUG 21 2002

Identification Number: C00235853

Reference: Amended May Monthly Report (4/1/02-4/30/02), received 7/1/02

Dear Ms. Birch:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2002 primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR §104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and

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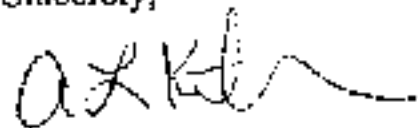
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Antoinette Kitchen
Senior Reports Analyst
Reports Analysis Division

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

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<input type="checkbox"/> 21b 28	<input type="checkbox"/> 22 27	<input checked="" type="checkbox"/> 23 28a	<input type="checkbox"/> 24 28b	<input type="checkbox"/> 25 28c	<input type="checkbox"/> 29
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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

Human Rights Campaign PAC

AK

Full Name (Last, First, Middle Initial)

A. Tom Lantos for Congress Committee

Date of Disbursement

04 / 19 / 2002

Mailing Address

PO Box 611

City

Burlingame

State

CA

Zip Code

94011

Amount of Each Disbursement This Period

1000.00

Purpose of Disbursement

Contribution: Tom Lantos (CA-12-D)

Candidate Name

Tom Lantos (CA-12-D)

Category/
Type

CA(12) DOE 3/5/02

Contribution: Tom Lantos
(CA-12-D)Office Sought: ☒ House

Senate

President

Disbursement For:

2002

☒ Primary

General

Other (specify) ▼

State: CA

District: 12

Transaction ID: D2550

Full Name (Last, First, Middle Initial)

B. Lofgren for Congress

Date of Disbursement

04 / 19 / 2002

Mailing Address

111 West Saint John Street

Suite 400

City

San Jose

State

CA

Zip Code

95112

Amount of Each Disbursement This Period

1000.00

Purpose of Disbursement

Contribution: Zoe Lofgren (CA-16-D)

Candidate Name

Zoe Lofgren (CA-16-D)

Category/
TypeContribution: Zoe Lofgren
(CA-16-D)Office Sought: ☒ House

Senate

President

Disbursement For:

2002

Primary

☒ General

Other (specify) ▼

State: CA

District: 16

Transaction ID: D2551

Full Name (Last, First, Middle Initial)

C. Friends of Sherrod Brown

Date of Disbursement

04 / 30 / 2002

Mailing Address

807 14th Street NW Suite 800

City

Washington

State

DC

Zip Code

20005

Amount of Each Disbursement This Period

1000.00

Purpose of Disbursement

Contribution: Sherrod Brown (OH-13-D)

Candidate Name

Sherrod Brown (OH-13-D)

Category/
TypeContribution: Sherrod Brown
(OH-13-D)Office Sought: ☒ House

Senate

President

Disbursement For:

2002

☒ Primary

General

Other (specify) ▼

State: OH

District: 13

Transaction ID: D2552

SUBTOTAL of Disbursements This Page (optional)

3000.00

TOTAL This Period (last page this line number only)

22.03.770.13108